

IN THE UNITED STATES DISTRICT COURT  
FOR THE WESTERN DISTRICT OF OKLAHOMA

THOMAS H. BATES,

Plaintiff,

v.

STATE FARM FIRE AND CASUALTY  
COMPANY,

Defendant.

Case No. CIV-21-00705-JD

**PLAINTIFF'S LIST OF EXHIBITS**

COMES NOW the Plaintiff, Thomas H. Bates, and pursuant to the Court's Scheduling Order [Doc. No. 14] submits the following Exhibit list.

No.	Description of document	Expected to be used/May be used
1.	Plaintiff's insurance policy with State Farm Fire and Casualty Company	Expected.
2.	State Farm claim file for Plaintiff's claim	Expected.
3.	State Farm estimate regarding Plaintiff's property	Expected.
4.	Aegis Roofing and Construction estimates regarding Plaintiff's property	Expected.
5.	Aegis Roofing and Construction photographs regarding Plaintiff's property	Expected.
6.	AccuWeather hail report for Plaintiff's property created on January 30, 2021	May.
7.	Documents produced by Aegis Roofing and Construction pursuant to Subpoena Duces Tecum	May.

8.	Aegis Roofing Invoice dated January 28, 2013	Expected.
9.	Underwriting file for Plaintiff's property	May.
10.	Text communications between Jonathan Marks and Corbin Swain regarding Plaintiff's property	May.
11.	Communications between State Farm's agents and/or employees and Plaintiff, Gary Bates, and/or Marian Bates	Expected.
12.	Communications between Jonathan Marks and Gary Bates regarding Plaintiff's property and State Farm claim	May.
13.	Communications between Jonathan Marks and Marian Bates regarding Plaintiff's property and State Farm claim	May.
14.	Communications between Jonathan Marks and Gary Bates and Marian Bates regarding Plaintiff's property and State Farm claim	May.
15.	Better Business Bureau complaints and responses produced	May.
16.	Oklahoma Department of Insurance complaint and response	May.
17.	Communications between State Farm's agents and/or employees regarding Plaintiff's claim	Expected.
18.	State Farm's Operation Guides, Standard Claim Processes, and Oklahoma Jurisdictional References concerning claim handling	Expected.
19.	State Farm's responses and supplemental responses to Plaintiff's Interrogatories, Requests for Production and Requests for Admission	Expected.
20.	State Farm's Operation Guides, Standard Claim Processes, and Oklahoma Jurisdictional References concerning wind/hail claims	Expected.

21.	State Farm's Operation Guides, Standard Claim Processes, and Oklahoma Jurisdictional References concerning the duty of good faith and fair dealing	Expected.
22.	State Farm's training materials and videos concerning wind/hail claims.	Expected.
23.	State Farm brochure, "Evaluating Composition Shingles"	Expected.
24.	Similarly situated claim files handled by State Farm	Expected.
25.	Photographs of Corbin Swain regarding Plaintiff's property	Expected.
26.	State Farm's Annual Statements	May.
27.	State Farm's Form 10-Ks	Expected.
28.	Aerial images of area of Plaintiff's property	May.
29.	Internal correspondence from State Farm concerning handling of wind/hail claims.	May.
30.	All documents produced by Michael Joe Lewis and Stephanie Lewis in <i>Michael Lewis and Stephanie Lewis v. State Farm Fire and Casualty Company</i> , CIV-20-648-HE	May.
31.	All documents produced by State Farm in <i>Michael Lewis and Stephanie Lewis v. State Farm Fire and Casualty Company</i> , CIV-20-648-HE	May.
32.	Rule 26 expert reports of any designated experts in this matter by either party	May.
33.	Any documents reviewed and/or relied upon by any designated expert in this matter by either party	Expected.
34.	All documents produced in this litigation pursuant to a Subpoena Duces Tecum	May.

35.	All documents produced by Plaintiff during discovery to which Plaintiff does not object	May.
36.	All documents produced by State Farm during discovery to which Plaintiff does not object	May.
37.	All exhibits to depositions taken in this matter, not otherwise objected to by Plaintiff	May.
38.	Demonstrative exhibits, aids, summaries, and diagrams	May.
39.	All exhibits necessary for rebuttal	May.
40.	All exhibits necessary for impeachment	May.
41.	As discovery is ongoing, Plaintiff reserves the right to amend this exhibit list	May.

MILLER JOHNSON JONES  
ANTONISSE & WHITE, PLLC

By: s/Shawna L. Landeros  
 Brad Miller, OBA #11437  
 J. Logan Johnson, OBA #12722  
 Shawna L. Landeros, OBA #31637  
 500 NW 6<sup>th</sup> Street, Suite 300  
 Oklahoma City, OK 73102-1219  
 Telephone: (405) 896-4388  
 Fax: (405) 609-2995  
 bmillier@mjjaw.com  
 ljohnson@mjjaw.com  
 slanderos@mjjaw.com  
*Attorneys for Plaintiff*

**CERTIFICATE OF SERVICE**

I hereby certify that on March 22, 2022, I electronically transmitted the attached document to the Clerk of Court using the ECF System for filing. Based on the records currently on file, the Clerk of Court will transmit a Notice of Electronic Filing to the following ECF registrants:

Lance E. Leffel, OBA #19511  
Paula M. Williams, OBA #30772  
GableGotwals  
BOK Park Plaza  
499 West Sheridan Ave., Suite 2200  
Oklahoma City, OK 73102  
Telephone: (405) 235-5500  
Fax: (405) 235-2875  
*Attorneys for Defendant*

s/Shawna L. Landeros

Shawna L. Landeros